

166651

MEMORANDUM

DATE: April 10, 2001

TO: Candy Morin, Project Manager

FROM: Terri Blake Myers, RCRA-GAU, Permit Section

SUBJECT: Groundwater Monitoring Plan for Containment Cell Design Report

RE: 1630200005 - St. Clair County
Sauget Sites, Area 1
Superfund/Technical File

As requested I have reviewed the above referenced document dated March 19, 2001. Specifically, I reviewed the document entitled "Groundwater Monitoring Plan For Time Critical Removal Action Dead Creek Sediments and Soils TSCA Containment Cell, Cahokia, Illinois" (GMP) to evaluate compliance with State of Illinois regulations and have provided the comments below. A technical review of the GMP was not conducted.

1. The information provided in the GMP does not clearly identify and/or discuss how the GMP will be conducted to meet the requirements found in 35 Ill. Adm. Code 724, Subpart F, identified as an Applicable Relevant and Appropriate Requirement (ARAR) for the site.
2. Page 21 of the document states that "Maximum detected concentrations of constituents for all classes of chemicals in cross-gradient sampling locations were below standards for Illinois Class II: General Resource Groundwater as defined in 35 IAC 620 and 35 IAC 742 Appendix B." The American Bottoms meet the definition of a Class I: Potable Resource Groundwater in accordance with 35 Ill. Adm. Code 621.210 and must therefore meet the groundwater quality standards found in 35 Ill. Adm. Code 620.410.
3. References to 35 Ill. Adm. Code Part 742 throughout the submittal were in regards to comparisons to look-up tables for groundwater standards. Any other utilization of 35 Ill. Adm. Code Part 742 to address groundwater at the site is inappropriate.

4. The determination of parameters for inclusion in the detection monitoring parameter list is inappropriate. The RCRA requirements for hazardous waste landfills have been determined to be an ARAR for the remedial actions at this site. Therefore, in accordance with 35 Ill. Adm. Code 724.193(a), the parameter list must include constituents that have been detected in groundwater in the uppermost aquifer underlying the unit and that are reasonably expected to be in or derived from waste contained in the unit. Groundwater in the vicinity of the containment facility contains both VOCs and SVOCs, as well as a number of inorganics not included in the proposed parameter list. The parameter list must include, at a minimum, those additional parameters that have been detected above the applicable 35 Ill. Adm. Code 620.410 Groundwater Quality Standard.

cc: Bureau File
Terri Blake Myers

U.S. ENVIRONMENTAL
PROTECTION AGENCY

JUL 05 2001

OFFICE OF REGIONAL
COUNSEL